

EXHIBIT 1

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UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,)
individually and as Parent)
and legal guardian of ww, KW)
GW and LW, minor children of)
MATTHEW WADSWORTH,)

Plaintiffs,)
) Case No.

vs.) 2:23-cv-00118-NDF

WALMART, INC., and JETSON)
ELECTRIC BIKES, LLC)

Defendants,)
)

DEPOSITION OF RYAN PASBORG

Wednesday, November 15, 2023, 9:30 a.m.

Via Zoom video conference

BE IT REMEMBERED that the deposition of RYAN PASBORG was taken by the attorney for the Plaintiffs, GRAYSON GOODY, ESQ., 58 Malaga Cove Plaza, Palos Verdes Estates, California 90274 before Christine J. Roybal, Court Reporter for the State of Idaho, in the above-entitled matter.

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1 know it was probably still dark at that time?

2 A. It was extremely dark and it was frigid outside.

3 If I recall, it was -- there was a little bit of fog right
4 there in the map, you can actually see there's a river that
5 runs right next to that, which is the Green River, so you
6 have the cold coming off of that so it was a little foggy if
7 I recall right.

8 Q. You mentioned your plan was to go to work but you
9 had to go pick up your crew first. The truck you jump into,
10 is that your personal truck or is that a work truck?

11 A. It's a work truck.

12 Q. And was your personal truck at the house or where
13 was it?

14 A. My personal car was at the house, yes, sir.

15 Q. Got it. So you jump into your work truck, and
16 what are you driving, by the way?

17 A. I don't remember the exact year, but it was a
18 Chevy half-ton four-door long bed with a fuel tank, fuel
19 cell and everything in the back.

20 Q. What color was that truck?

21 A. White.

22 Q. So you jump in the car, it's about 3:55 a.m., and
23 you start to drive, I'm assuming, along this route that's
24 marked on Exhibit 2; is that right?

25 A. That is correct.

1 Q. And at some point during this drive does anything
2 catch your attention, whether it's smoke or fire?

3 A. I could see the fire.

4 Q. If you were to tell us where on this map you were
5 when you first saw the fire, could you do that?

6 A. So I left the house and took the right-hand turn
7 right on to 374 and go to your right, that's a little too
8 far, there's a little hill, yes, sir, right in there there's
9 a little hill and that's about where I could see the fire
10 from.

11 Q. So along this blue track that we have, it looks
12 like you're indicating you first saw the fire just a little
13 bit before that 374 marker, the first one there; is that
14 correct?

15 A. That is correct, sir.

16 Q. And if you can describe for us, what did it look
17 like from that vantage point?

18 A. I seen the flames and the first thing that ran
19 through my head was I thought somebody was burning their
20 trash.

21 Q. Did you smell anything at the same time?

22 A. No.

23 Q. Got it. So you see these flames and you think
24 somebody is burning their trash, did you think anything
25 else?